Joyce W. Lindauer State Bar No. 21555700 Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, Texas 75202 Telephone: (972) 503-4033 Facsimile: (972) 503-4034

PROPOSED ATTORNEYS FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:

\$
BUFFALO STATION, LLC,
\$
CASE NO. 22-42943-elm-11
\$
Chapter 11

DEBTOR'S MOTION TO JOINTLY ADMINISTER CASES

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 W. 10TH ST., FORT WORTH, TX 76102 BEFORE CLOSE OF BUSINESS ON DECEMBER 27, 2022, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN. TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Buffalo Station, LLC, the Debtor in the above styled and referenced bankruptcy case and files this its *Debtor's Motion to Jointly Administer Cases* and in support of same would respectfully show the following:

- 1. Buffalo Station, LLC filed a voluntary petition under Chapter 11, Title 11 of the United States Bankruptcy Code on December 5, 2022, case number 22-42943-elm, which is pending before this Court, and will be operating its business as debtor-in-possession.
- 2. Premier 82, LLC filed a voluntary petition under Chapter 11, Title 11 of the United States Bankruptcy Code on December 5, 2022, case number 22-42944-elm, which is pending before this Court, and will be operating its business as debtor-in-possession.
- 3. Remington Station, LLC filed a voluntary petition under Chapter 11, Title 11 of the United States Bankruptcy Code on December 5, 2022, case number 22-42945-elm, which is pending before this Court, and will be operating its business as debtor-in-possession.
- 4. Ventura Heights, LLC filed a voluntary petition under Chapter 11, Title 11 of the United States Bankruptcy Code on December 5, 2022, case number 22-42948-mxm, which is pending before this Court, and will be operating its business as debtor-in-possession.
- 5. Windsor at 82nd for Pinewood, LLC filed a voluntary petition under Chapter 11, Title 11 of the United States Bankruptcy Code on December 5, 2022, case number 22-42950-mxm, which is pending before this Court, and will be operating its business as debtor-in-possession.
- 6. The liabilities of Buffalo Station, LLC; Premier 82, LLC; Remington Station, LLC; Ventura Heights, LLC; and Windsor at 82nd for Pinewood, LLC substantively overlap. It would be difficult to propose a plan of reorganization in the cases without them being jointly administered. Joint Administration is in the best interest of the estates, creditors, and the Debtors.
- 7. It is necessary to jointly administer the five cases for administrative purposes and for the purpose of proposing a joint plan of reorganization.
- 8. The cases should be jointly administered under the case number of the first-filed case.

WHEREFORE, PREMISES CONSIDERED, Buffalo Station, LLC requests that the Court jointly administer the five referenced cases; and for such other and further relief to which the Debtor may show itself to be justly entitled.

Dated: December 5, 2022.

Respectfully submitted,

/s/ Joyce W. Lindauer

Joyce W. Lindauer State Bar No. 21555700 Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, Texas 75202

Telephone: (972) 503-4033 Facsimile: (972) 503-4034

PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 5, 2022, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the U.S. Trustee and the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Case 22-42943-elm11 Label Matrix for local noticing 0539-4 Case 22-42943-elm11

Northern District of Texas

Ft. Worth Mon Dec 5 15:40:59 CST 2022

6502 NW Cache Road Lawton, OK 73505-3309

Al Appliance Andy's Plumbing

208 NW Euclid Ave Lawton, OK 73507-7053

330 Madeline Lane

Burleson, TX 76028-3262

Buffaboctinent Page 4 of 5

Arrow Sign Company 1344 SE 1st St Lawton, OK 73501-5793

Fort Worth, TX 76102-3637

Doc 2 Filed 12/05/22 Entered 12/05/22 15:59:44 Desc Main Buffalto-Station, JLC Page 4 of 5

Attorney General of Texas Bankruptcy Div PO Box 12548 Austin, TX 78711-2548

Budget Contracting 5502 SE Bishop Road Lawton, OK 73501-9234 Cd Carpet Cleaning and Janitorial 2408 SW 44th Street Lawton, OK 73505-8049

(p) TEXAS COMPTROLLER OF PUBLIC ACCOUNTS REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION PO BOX 13528 AUSTIN TX 78711-3528

Daniel V. Carsey Bancfirst Tower 100 N Broadway Ste 2900 Oklahoma City, OK 73102-8865 David R. Payne 119 North Robinson Avenue, Suite 400 Oklahoma City, OK 73102-4613

El Lider 8350 Moberly Lane Dallas TX 75227-2315 Environmental Pest Control 2015 SW D Ave Lawton, OK 73501-4448

Extreme Clean Carpet Clean 1906 NW Ash Ave Lawton, OK 73507-5013

Firepros 916 SW 2nd Street Lawton, OK 73501-5355 HD Supply P.O. Box 509058 San Diego, CA 92150-9058

Internal Revenue Service Centralized Insolvency Operations PO Box 7346 Philadelphia, PA 19101-7346

Internal Revenue Service Mail Code DAL-5020 1100 Commerce Street Dallas, Texas 75242-1100 J & J Plumbing 2012 NW Hoover Ave Lawton, OK 73507-1031

Johnson Plumbing 7973 US Highway 277 Elgin, OK 73538

K.W. Landscaping 206 Se Larrence St Lawton, OK 73501-5470

(c) LAWTON TERMITE & PEST 707 NE 60TH ST LAWTON OK 73507-9789

Leslie's Pools 4011 NW Cache Road Lawton, OK 73505-3633

Locke Supply 1022 NW 38th Street Lawton OK 73505-3704 Luckinbill, Inc. 605 SE 2nd St Lawton, OK 73501-2408 Pippen Brothers 207 SE D Ave Lawton, OK 73501-5410

Promiseland Landscaping 28 NW 40th Lawton, OK 73505-4912

Revere Tactical Opportunities TRS, LLC 5910 N. Central Expressway, Suite 1600 Dallas, Texas 75206-5173

Sherwin Williams 1409 NW Horton Blvd Lawton, OK 73505-2929 Case 22-42943-elm11 Simon's Quality Pest Control 1127 NW Oak Ave Lawton, OK 73507-4613

Doc 2 Filed 12/05/22 Entered 12/05/22 15:59:44 Desc Main Spectrum Paint Spectrum Paint SooneDScuriffe Page 5 of 5 901 SE 1st Street Lawton, OK 73501-2495

1026 NW 38th Street Lawton, OK 73505-3704

Staples 500 Staples Dr Framingham, MA 01702-4474

U. S. Trustee's Office 1100 Commerce Street Room 976 Dallas, TX 75242-1011

US Attny. General 10th and Constitution Ave., NW Main Justice Bldg. Rm. 5111 Washington, DC 20530-0001

United States Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-0996 Waste Connections 2410 NW Cache Rd. Lawton, OK 73505-5287 Joyce W. Lindauer Joyce W. Lindauer Attorney, PLLC 1412 Main Street Suite 500 Dallas, TX 75202-4042

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Comptroller of Public Accts Revenue Acctq Div Bankruptcy Sec PO Box 13528 Austin, TX 78711

> Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

Lawton Termite & Pest 902 NE 60th St Lawton, OK 73507

End of Label Matrix Mailable recipients 38 Bypassed recipients 0 Total 38